

Read by Jane Feldman



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EIS000727

*Southern Nevada Group*

P.O. Box 19777, Las Vegas, NV 89132

January 11, 2000

Ms. Wendy Dixon, EIS Project Manager  
M/S 010  
US Department of Energy  
Office of Civilian Radioactive Waste Management  
Yucca Mountain Site Characterization Office  
PO Box 30307  
North Las Vegas NV 89036-0307

Dear Ms. Dixon:

- 1 The local chapter of the Sierra Club opposes the proposed Yucca Mountain project for the following reasons. Our reasons fall into five areas of concern: site safety, alternatives considered, risk assessment, transportation issues, and issues with environmental justice and public participation.

**Site Safety:**

- 2 The Department of Energy (DOE) has in its possession data and evidence of two disqualifying conditions, both in reference to hydrologic considerations, on the suitability of the Yucca Mountain site. The DOE has not proven that the site is safe as a long-term geologic repository for the disposal of nuclear and radioactive waste. Therefore, Yucca Mountain should be disqualified for consideration as a disposal site.
- 3 There has been no field testing of the system for retrieving the rods, should that become necessary in the future. How can we place confidence in a project that claims retrieval of the rods would take a minimum of 25 years? If, for some reason, the computer-generated models of Yucca Mountain's safety were wrong and the rods had to be retrieved, what would happen in those 25 intervening years? Would the federal government re-locate all affected residents to a safe area? Buy their properties? Assure economic viability despite relocation?

*To explore, enjoy, and protect the wild places of the earth...*



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**Alternatives:**

- 4 The no-action alternatives are unreasonable alternatives. Neither scenario 1 nor scenario 2 are feasible, thus making the proposed action seem like the best and only course of action. DOE has failed to provide reasonable no-action alternatives despite being advised by their attorneys that this should be done. Why did you not consider an alternative to encapsulate or otherwise stabilize the waste on-site where it is generated, thus driving to zero the risk to citizens and the natural environment along transportation routes? Why is scenario 2 the only course of action that would lead to environmental justice impacts? The DOE has been disingenuous in creating two no-action alternatives that are not logically, scientifically, or morally sound.
- 5 How are we to believe that the calculated risk due to earthquake and seismic activity is insignificant, when in October 1999 an earthquake awakened all of us in our beds? How can we be confident that the DOE knows what types of seismic and volcanic activity may occur in the next 10,000 years?
- 6 Even though you were not required to do so by law, you should have considered alternate geologic disposal sites, and you should have considered alternate technologies to a geologic disposal. If science was funded for research to develop nuclear energy, why can't funds be allocated to develop technology for disposal??

**Calculated and Perceived Risk:**

- 7 The DEIS finds that all the calculated risks are statistically insignificant, and thus do not require mitigation or compensation. This raises questions about the scientific validity of the YM Project. How can there be no major impacts to people or to the environment when a project of this scope and magnitude has never been attempted before?
- 8 The calculated risk due to seismic activity considers activity at Yucca Mountain; it does not consider risk to cargo enroute to Yucca Mountain.
- 9... The entire issue of calculated risk is a major concern. There is no mention of the degree of uncertainty associated with any of the risk assessments. With no data to the contrary, we can only assume that the degrees of uncertainty are high. Furthermore, population data are based on 1990 figures. You estimate that 80,000 people will live around Las Vegas's Northern Beltway. The County estimates that 380,000 people will live around the Beltway in 2010. The calculated risk and exposure will be gravely larger with an accurate estimate of the Valley's population.

9 cont.

Calculated risk assessments must use better data, more variables, and provide better estimates.

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Why are the only calculated health risks latent cancer fatalities? There is no assessment of ill health or radioactive sicknesses which could occur from releases into the air, water, or soil. An obvious omission is the risk of injury and death caused by increased traffic accidents both within Southern Nevada and along the entire length of the transportation routes.

Risk assessments must include all risk factors, and must consider all known and probable impacts to quality of life, the health of citizens and the natural environment, and the economic viability of the region.

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Why is perceived risk not included in the analysis? Human behavior is not governed by science and rationality. There is a large factor of perceived risk that does and will have a real and significant impact on the economic viability of the region. Why has DOE failed to provide analysis of perceived risks and the consequent stigma surrounding the quality of life for humans, ecosystems, and the region's economy?

#### Transportation issues:

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There has been no field testing of the casks and the transportation system.

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Furthermore, there is no mention of actions to prevent, to compensate or to mitigate local governments for increased wear and tear and for damage to the highway infrastructure caused by the 220 foot long transport vehicle.

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Why has DOE failed to address impact associated with this type of transportation vehicle, and failed to provide assurances that tax-payers will not be burdened with increases to repair roadways damaged by the project?

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Why is there no mention of the increased costs to Clark County, or to any other location along the transportation route, should there be an accident in which radioactivity is released into the environment? Radiation release causes health risk and contaminates the highway surface and the surrounding area. Using your own DOE accident and incident data, Clark County estimates that 46 such incidents of surface contamination will occur within Clark County for the Proposed Action of this DEIS, and that 3 incidents of radioactive contamination beyond the vehicle will occur. These figures are only within Clark County! The response to all such accidents and incidents must be addressed within the DEIS.

- 15 [Health insurance policies routinely exclude nuclear and radioactive accidents from  
policy coverage. Will the taxpayers be levied an additional tax burden for increased  
21 indigent medical funds? What information is being provided to planning authorities so  
that they can increase and train emergency response and medical personnel when  
waste transportation begins?

There is no mention, nor is there any data given, for emergency action plans to be developed at Yucca Mountain, within the metropolitan area of Las Vegas, nor any other metro area that your transportation routes go through, nor anywhere along those transportation routes. An accident not only can but will occur at some time, some where. Every inch of the way needs information to develop their own emergency action plans.

There is no mention of compensation or mitigation because of an increase in government services required because of the activity along the transportation routes and at Yucca Mountain. There will be an increased need for government inspectors in several different organizations, increased law enforcement, etc. etc.

**Environmental justice and public participation:**

- 16 [Why have the environmental justice impacts along the transportation corridors been  
ignored? We find it incredible that a project that affects so many communities along so  
17 many major transportation routes result in absolutely no impacts. Why are the people  
who live along the routes being denied an opportunity to participate in the EIS process?  
Why has DOE not taken a proactive position and invited all affected parties to  
participate in the decision-making process? ]
- 18 [Why have some segments of the population been categorically excluded from  
participating in the EIS process? The DEIS has not been translated into Spanish,  
despite the fact that Las Vegas has a large Hispanic population. Have provisions been  
made for translators at all of the public hearings, so citizens with primary languages  
other than English have an equal opportunity to participate in the decision-making  
process? Have copies of the Executive Summary been made available in Braille so  
blind citizens have an opportunity to participate?
- 19 [Why has there been so limited involvement with the Native American population? All  
the nations and peoples who live along the transportation routes must be involved in  
complete and thorough negotiations with our government in the development of this  
DEIS.

Wendy Dixon, EIS Project Manager  
US Department of Energy  
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**In summary:**

- 20 [ The DEIS is woefully lacking. It fails to provide citizens with the necessary assurances that the Yucca Mountain project has merit on any grounds other than political expediency. For all of these reasons, the Sierra Club opposes the project and requests that a Supplemental EIS be issued which addresses the issues raised herein.

Sincerely,

*Marcia Forkos*

Marcia Forkos  
Chair,  
Southern Nevada Group